#### IN THE DISTRICT COURT OF THE UNITED STATES WESTERN DISTRICT OF TEXAS EN BANC PANEL

November 04, 2022

CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS

CC

THE STATE OF TEXAS, ex rel; Estates of Frank A. Wallace, Lisa F. Wallace And Lorice T. Wallace (All Deceased), by Successor Trustee, Stephen P. Wallace, and All Texas Trust Estate Family's similarly situated,

RICO CLASS ACTION PLAINTIFFS,

DEPUTY

V.

Case #: 1:22-cv-01079 Hon. Chief Judge Orlando L. Garcia And the EN BANC PANEL

Jamie Dimon, JP Morgan Private Bank, James Inhofe, Jack Kirkpatrick, Kevin Stitt, et al., already of RECORD, And John & Jane Does not yet named, RICO CLASS ACTION DEFENDANTS.

EMERGENCY MOTIONS FOR HON. CHIEF JUDGE ORLANDO L. GARCIA TO ISSUE THE "WITNESS PROTECTION ORDER, SUA SPONTE", REQUESTED SINCE INCEPTION OF RICO CLASS ACTION CASE FILED ON OCTOBER 25th, 2022, AND FOR THE STATE TO ADVANCE EXPENSES, PENDING REIMBURSEMENT TO THE STATE BY ORDER OF HON. ORLANDO L. GARCIA FROM STATE REPARATIONS

1 That PLAINTIFFS' requested "WITNESS PROTECTION" in their COMPLAINT; 2 That DEFENDANTS' perpetrated "Attempted Murder" upon Wallace in 2009 while Wrongfully Incarcerated, and have continued to Stalk him for Termination; 3 That on November 4th, 2022, PLAINTIFFS' filed their 1st Amended COMPLAINT; 4 That today the Enterprise Actors engaged Criminals to Stalk Wallace @ his San Antonio hotel for Abduction and Termination; Wherefore Chief Judge Garcia has a Non-Discretionary Duty, after NOTICE, to "Protect ALL PLAINTIFFS' INTEREST". (see Exhibits-in-Support) Speghen P. Wallars

November 4th, 2022

#### **CERTIFICATE of SERVICE**

I certify that All Interested Parties received these Documents today via PDF

Stephen P. Wallace

# WESTERN DISTRICT OF TEXAS EN BANC PANE 25 AND 10: 10

CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS BY DEFUTY CLERK

THE STATE OF TEXAS, ex rel;

Estates of Frank A. Wallace & Lisa F. Wallace, By Successor Trustee, Stephen P. Wallace, and All Texas Trust Estate Family's similarly situated, RICO CLASS ACTION PLAINTIFFS,

vs.

CASE NO. 1:22CV01079 LY

Jamie Dimon, JP Morgan Private Bank, James Inhofe, Jack Kirkpatrick, Kevin Stitt, and John & Jane Does not yet named, RICO CLASS ACTION DEFENDANTS.

## RICO CLASS ACTION COMPLAINT Under Authority of [Title 18, USC; Section 1964]

#### SUBJECT MATTER JURISDICTION

1 FEDERAL QUESTION JURISDICTION: Title 28, USC; Section 1331: This USDC for the [WD TX] has Subject Matter Jurisdiction under [Title 18 USC; \*1964], and by virtue of sufficient Pleading, irrefutable FACTS of RECORD, and Expert Witness Testimony, clearly articulating Violations of [Title 18, USC; Sections 1961 & 1962] pled with "Specificity and Particularity".

#### **PARTIES**

2 That the above Actos-in-Conversion continue to Conspire and Perpetrate their Interstate RICO ENTERPRISE with Impunity, with Total Disregard for Human Life, 'Under Color of Law & Fiduciary', upon deceased Down syndrome Lisa F. Wallace and Private Attorney General/Co-Victim, Stephen Wallace;

#### CHRONOLOGY OF IRREFUTABLE FACTS OF RECORD

3 That commencing while Frank Wallace was dying from Cancer, the Wallace Family Trust/CPA counsel for decades covertly conspired these RICO Predicate Actors, et al; to "Sanitize & Spoliation of the Irrevocable 1974 Trust Indentures, to criminally eliminate Down syndrome LISA, as the Priority Beneficiary, and STEPHEN as the "Named/Appointed Successor Trustee", aka IDENTITY THEFT;

4 That immediately after Frank's death, Predicate Actors commence to illicitly LIQUIDATE All "Unique & irreplaceable large Realty tracts, including the very substantiate OIL & GAS RESERVES lying thereunder", under color of Law, via filing extensive sham Litigation vs. Wallace Family Estate Beneficiaries in the Tulsa County Probate court, with their former law partner presiding, who did Grant every Claim, most ex parte;

5 That Stephen then went to Chicago to alert CEO of Bank ONE, Jamie Dimon, of the sham predatory conversions of inalienable Rights to Life, Liberty & the Pursuit of Happiness by his own Tulsa Officers & Lawyers in criminal collusion;

6 That Jamie Dimon, sua sponte, removed the RES, SITUS & ADMINISTRATION of Frank's Irrevocable Trust ASSETS [50%] to the DFW HQ of Bank ONE, just before it was acquired by JP MORGAN, with DIMON named as CEO & Chairman;

7 That the CHRONOLOGY enclosed confirms, with Specificity and Particularity, of the Interstate RICO; KIDNAPPING; ABANDONMENT; FAILURE TO THRIVE of LISA, inflicting a horrid DEATH, just as was perpetrated upon **ROBBIE MIDDLETON**;

8 That the enclosed "VERIFIED CRIMINAL CHARGES COMPLAINT" was personally filed @ the Dallas FBI FIELD OFFICE by former Dallas FBI Supervisor, Davis Gillis and Stephen Wallace on the 5<sup>th</sup> of October, 2022, and emailed to the respective FBI Agents of Record on October 7<sup>th</sup>, 2022, with NOTICE to the Predicate Actors;

9 That since Governor Abbott & Solicitor General Stone have Waived any RIGHT to CLAIM the State's REPARATIONS, thus RICO Class Action Plaintiffs have now pledged any IRS consequences for Restitution to the to be incorporated, <u>"Texas Enterprise Fund FOUNDATION"</u>;

10 That the empaneled [WD TX] Jury will timely have NOTICE of the upcoming FBI's "Criminal Referral to Austin's US Attorney, ASHLEY C. HOFF, to compelithe Multi-District GRAND JURY, sua sponte;

11 That Stephen P. Wallace request <u>WITNESS PROTECTION</u> from this [WD TX] En Banc Panel, as he continues to be Stalked for Abduction and Termination.

Respectfully submitted,

Stephen P. Wallace, Co-Victim & RELATOR

11305 Quail Creek Road

Oklahoma City, OK. 73120

(331) 575-2341

#### **AFFIDAVIT**

I swear/affirm the foregoing is True under Penalty of Perjury.

Stugher PWallace

County of <u>Travis</u>
State of <u>Teyas</u>

Stephen P. Wallace appeared before me this  $2 \le 1$  day of October, 2022, and signed this Affidavit.



*Drenda, Kami re* Notary Public

## IN THE DISTRICT COURT OF THE UNITED STATES WESTERN DISTRICT OF TEXAS EN BANC PANEL

THE STATE OF TEXAS, ex rel;
Estates of Frank A. Wallace & Lisa F. Wallace,
By Successor Trustee, Stephen P. Wallace, and
All Texas Trust Estate Family's similarly situated,
Amending and Adding,
\*Estate of Lorice T. Wallace,
RICO CLASS ACTION PLAINTIFFS,

CASE #: 1:22-CV-01079

Hon. Chief Judge Orlando L. Garcia
And the EN BANC PANEL

VS.

Jamie Dimon, JP Morgan Private Bank, James Inhofe,
Jack Kirkpatrick, Kevin Stitt, et al., already of RECORD,
Amending and Adding,
\*Trust Company of Oklahoma; Thomas Wilkens,
Robert Lorton, Sr., James Milton, James Weger,
Ronald J. Saffa, Morrel Law PLLC, and John & Jane Does
Not yet named, RICO CLASS ACTION DEFENDANTS.

#### 1<sup>ST</sup> AMENDED RICO CLASS ACTION COMPLAINT

1 That former JP Morgan Private Bank Senior V.P., MARK CLEMONS, based in JPM PB in Dallas, Texas, made multiple trips to Tulsa, OK., to meet with the last remaining Co-Trustees, LORICE T. WALLACE and Stephen P. Wallace, to assure Co-Trustees that JP Morgan Private Bank would correct the blatant "Misfeasance & Malfeasance being perpetrated under color of Fiduciary" by the TRUST COMPANY of OKLAHOMA, it's Owner, ROBERT LORTON, SR., it's President, THOMAS WILKENS, and their lawyer in conspiracy, JAMES MILTON; (see May 24,'04 Edson L. Bridges II Letter & Texas Supreme Court Complaints)

2 That JP Morgan Private Bank VP, **JOHN THIBIDEAUX**, came to Tulsa multiple times to TESTIFY & FILE FALSE CLAIM DEEDS to the Wallace Family **"250 Acres, and the 12 Oil & Gas Wells producing in the famous GLENPOOL RESERVOIR"**, still producing today for CONOCO/PHILLIPS @ [5<sup>th</sup> Cir. Case #:2007cr11283;

3 That JAMES MILTON and RONALD SAFFA confessed JURISDICTION in Texas by enter Appearance in both of the 5<sup>th</sup> Circuit CASES of RECORD regarding the relentless attempts to **SAVE LISA FROM HER FAILURE TO THRIVE & DEATH**;

4 That Co-Victim & RELATOR, Stephen P. Wallace urges **Hon. Orlando L. Garcia** to formally enter Wallace into a **Witness Protection Program**, which expenses to be Advance by the State of Texas, and reimbursed @ conclusion of RICO Cases, per ORDER of Hon. Orlando L. Garcia;

5 That TIMING IS PAST CRITICAL for Wallace's PROTECTION from RICO KLAN.

### NOVEMBER 1st, 2022

Filed via USPS Express Mail With Signature Confirmation

Respectfully submitted,

Stephen P. Wallace

11305 Quail Creek Road

Theyhen P. Walluce

OKC, OK. 73120

(331) 575-2341

#### **CERTIFICATE of SERVICE**

All Interested Parties will be served via PDF

#### RE: WITNESS PROTECTION -EMERGENCY!

From: TXWD\_ECF\_help (txwd\_ecf\_help@txwd.uscourts.gov)

To: spaulwallace@yahoo.com

Cc: jessica\_urrtia@txwd.uscourts.gov; austin.sa@fbi.gov; michael.e.horowitz@usdoj.gov; murbina@fbi.gov;

oc\_outreach@fbi.gov; dbgillis@yahoo.com; robmit@att.net

Date: Friday, November 4, 2022, 09:02 AM CDT

Mr. Wallace,

We do not accept filings in this email box.

Please utilize the links on our website to have this put on the docket in your case.

Electronic Submission For Pro Se Filers – U.S. District Court (uscourts.gov)

NOTE: ELECTRONIC FILING IS NOW MANDATORY TXWD ECF Help Desk U.S. District Court Western District of Texas Support Hours: 8am - 6pm CT Monday - Friday (excluding holidays)

From: Stephen Wallace <spaulwallace@yahoo.com>

Sent: Friday, November 4, 2022 6:46 AM

To: TXWD\_ECF\_help <txwd\_ecf\_help@txwd.uscourts.gov>

Cc: jessica\_urrtia@txwd.uscourts.gov; austin.sa@fbi.gov; michael.e.horowitz@usdoj.gov; murbina@fbi.gov;

oc\_outreach@fbi.gov; Dave Gillis <dbgillis@yahoo.com>; Robert Mitchell <robmit@att.net>

Subject: Fw: WITNESS PROTECTION -EMERGENCY!

#### **CAUTION - EXTERNAL:**

Inadvertently omitted Local Division

---- Forwarded Message -----

From: Stephen Wallace < spaulwallace@yahoo.com>

**To:** <u>jessica\_urrtia@txwd.uscourts.gov</u> < <u>jessica\_urrtia@txwd.uscourts.gov</u>>; <u>austin.sa@fbi.gov</u> < <u>austin.sa@fbi.gov</u>>; <u>michael.e.horowitz@usdoj.gov</u> < <u>michael.e.horowitz@usdoj.gov</u>>

**Cc:** <u>murbina@fbi.gov</u> <<u>murbina@fbi.gov</u>>; <u>oc\_outreach@fbi.gov</u>>; <u>Dave Gillis <dbgillis@yahoo.com</u>>; <u>Robert Mitchell</u> <robmit@att.net>

Sent: Friday, November 4, 2022, 06:39:36 AM CDT

Subject: WITNESS PROTECTION -EMERGENCY!

Chief Judge Orlando Garcia & San Antonio FBI: After the ENTERPRISE ACTORS received this Certificate of Service, I am being Stalked outside my San Antonio hotel, and Fear for my Life! TIMING IS CRITICAL FOR WITNESS PROTECTION "ORDER" !!! Stephen Wallace, RELATOR & CO-VICTIM @ (331) 575-2341

---- Forwarded Message -----

From: KIC Automatic <kicemail@kicservice.com>

To: "spaulwallace@yahoo.com" <spaulwallace@yahoo.com>

Cc: "stevewallace770@yahoo.com" <stevewallace770@yahoo.com>

Sent: Tuesday, November 1, 2022, 02:14:09 PM CDT

Subject: Images from KIC Station. Do not reply!!!

Images from KIC Station. Do not reply to this email, the return address is set for sending emails only!!!

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.